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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

1789 Foundation Inc., d/b/a Citizen AG,
and Lindsey Graham,

Plaintiffs,

v.

Adrian Fontes, in his official capacity as
Secretary of State,

Defendant.

Case No. CV-24-02987-PHX-SP

**STIPULATION EXTEND PENDING
DEADLINES**

(Second Request)

1 The parties are aware that the Court did not grant, in full, their prior extension
2 request. Since the Court granted the extension in part on December 13, 2024 (Doc. 32),
3 the parties have held two meet-and-confer conferences and the Secretary has produced
4 additional records including registration information and vote history for every active,
5 inactive, and canceled voter in Arizona for the 2020, 2022 and 2024 election cycles. The
6 Secretary continues to work to produce other, older records to Plaintiffs. However, the
7 resolution of the dispute between the parties, including their dispute regarding
8 compliance with this Court's Order, if resolution can be reached, necessitates the
9 expenditure of significant time and involvement by Secretary of State's office and
10 significant review time by Citizen AG. The parties jointly believe that there will be the
11 best opportunity for the amicable resolution of some or all of the issues at bar if a further
12 extension is granted.

13 Therefore, pursuant to Local Rule 7.3, Plaintiffs 1789 Foundation, Inc., d/b/a
14 Citizen AG, and Lindsey Graham (collectively, "Plaintiffs"), Defendant Adrian Fontes,
15 and proposed Intervenor One Arizona and Arizona Alliance for Retired Americans
16 hereby stipulate, agree to, and re-urge their request for extension of pending deadlines in
17 this matter. In particular, the parties agree that Plaintiffs may have until February 14,
18 2025 to file a response to the Motion to Intervene (Doc. 19) and Defendant may have
19 until February 21, 2025 to respond to the Complaint (Doc. 1).

20 This further extension will permit the parties to work in good faith to address
21 issues related to the availability and provision of voter records requested by Citizen AG.

22 For the Court's convenience, and proposed order is lodged herewith.

23 Dated: December 26, 2024

Respectfully submitted,

DAVILLIER LAW GROUP, LLC

/s/Alexander Kolodin

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Arizona Alliance for Retired
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CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of December, 2024, I electronically transmitted the attached document to the Clerk's Office using the ECF System for filing, and transmittal of a Notice of Electronic Filing to the ECF registrants on record.

DAVILLIER LAW GROUP, LLC

/s/Alexander Kolodin